

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

REMBRANDT 3D HOLDING LTD.,)	
)	
Plaintiff,)	
)	C.A. No. 23-193-JLH-SLR
v.)	
)	JURY TRIAL DEMANDED
TECHNOVATIVE MEDIA, INC. HAWK)	
INVESTMENT HOLDINGS LTD., AND)	
SEECUBIC, INC.,)	
)	
Defendants.)	

**STIPULATION AND [PROPOSED] ORDER TO EXTEND
CERTAIN SCHEDULING ORDER DEADLINES**

WHEREAS, the Court previously entered a Scheduling Order governing this case (D.I. 55);

WHEREAS, fact discovery is set to close on July 2, 2025;

WHEREAS, the parties have proceeded with discovery but request additional time to have a full opportunity to develop their claims and defenses prior to taking depositions in this action;

WHEREAS, changing the immediate deadlines will not impact any deadlines involving the Court, including the summary judgment or trial deadlines; and

WHEREAS, the parties certify, pursuant to District of Delaware Local Rule 16.4, that counsel for each party has sent a copy of this request to their respective clients;

NOW, THEREFORE, the parties hereby stipulate and agree, subject to the approval of the Court, that the deadlines in this action are extended as follows:

Event	Current Deadline	Proposed Deadline
Rembrandt's First Reduction of Trade Secrets to 25	N/A	July 28, 2025
Deadline for the close of fact discovery For the avoidance of doubt, the parties agree that they cannot serve any new written discovery requests (including but not limited to any new or amended interrogatories, requests for production, and requests for admission)	July 2, 2025	July 28, 2025
Deadline for Opening Expert Reports for each party that bears the initial burden of proof	July 23, 2025	August 11, 2025
Deadline for Rebuttal Expert Reports	August 13, 2025	August 25, 2025
Deadline for Reply Expert Reports	September 3, 2025	September 8, 2025
Close of Expert Discovery	September 17, 2025	September 22, 2025
Rembrandt's Second Reduction of Trade Secrets to 10	N/A	September 26, 2025
Deadline for the parties to file all case dispositive motions, an opening brief, and affidavits	September 29, 2025	No Change
Pretrial Conference	March 16, 2026 at 3:00 p.m.	No Change
Jury Trial	April 6, 2026	No Change

All other deadlines shall remain unchanged.

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Dated: June 23, 2025

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Attorneys for Defendant SeeCubic, Inc.

SO ORDERED this _____ day of _____, 2025.

UNITED STATES DISTRICT JUDGE